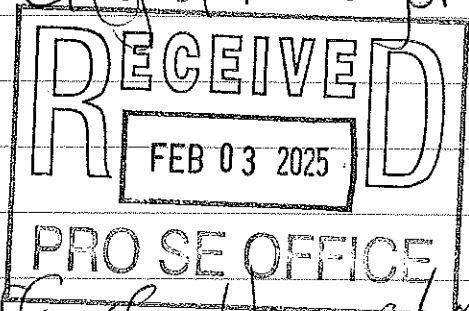


11/10/24

United States District Court
Southern District of New York
HONORABLE Jennifer H. Rearden
United States District Judge
US Court House - 500 Pearl Street
New York, NY 10007

RE: Peter Rodriguez v City of New York, et al.
20cv9840

Your Honor,



I am the PLAINTIFF of the above referenced matter. I am writing this letter to request a teleconference with your honor and the DEFENDANTS in order to create a Deadline for the PLAINTIFF to respond to DEFENDANTS MOTION to DISMISS.

By way of BACKGROUND the PLAINTIFF Brought this Federal Civil COMPLAINT to the Southern District after the DEFENDANTS VIOLATED PLAINTIFFS CONSTITUTIONAL rights given to him AS A U.S. CITIZEN.
IN E.C.F. NO. 151 the PLAINTIFF

requested legal assistance because PLAINTIFF WAS INCARCERATED AND WAS SUBJECTED TO UNCONSTITUTIONAL PRISON CONDITIONS WHICH HINDERED PLAINTIFFS ABILITY TO PROSECUTE THIS MATTER. IN RESPONSE YOUR HONOR ORDERED PLAINTIFF TO CONSULT THE LEGAL CLINIC NYLAG FOR ASSISTANCE IN LITIGATING THIS MATTER. PLAINTIFF ABIDED BY YOUR HONOR ORDER AND WAS IN CONTACT WITH A ATTORNEY WHO WORKS FOR NYLAG BY THE NAME OF JAMES D. TAYLOR, ESQ. DESPITE MULTIPLE ATTEMPTS FROM NYLAG TO CONTACT AND ASSIST PLAINTIFF UNCONSTITUTIONAL PRISON CONDITIONS HINDERED NYLAG FROM ASSISTING PLAINTIFF. PLAINTIFF HAS WRITTEN MULTIPLE LETTERS TO THE COURT TO INFORM YOUR HONOR OF THESE SITUATIONS. THE PLAINTIFF HAS YET TO HEAR BACK FROM THE COURT.

PLAINTIFF IS ONCE AGAIN REQUESTING THE COURT TO GRANT PRO BONO COUNSEL TO THE PLAINTIFF WHO FILED A REQUEST TO PROCEED IN FORMA PAUPER

(IFP) which this Court granted. THE in Forma Pauperis statute that the Courts "MAY request an attorney to represent any person UNABLE to Afford Counsel". THE COURT MUST then consider whether the Litigant's claim "seems Likely to be of substance" - "A requirement that MUST be taken seriously." (Hodge v. Police Officers, 802 F.2d 58, 60 (2d Cir. 1986)).

if these threshold requirements are met, the Court MUST consider such factors AS:

THE INDIGENT'S ABILITY to investigate the crucial facts, the complexity of the legal issue, AND any special reason in that case why appointment of Counsel would be more likely to lead to a just determination.

Plaintiff Attached to this letter a photo evidence of the assault and constitutional violation of the Plaintiff by the Defendant which is very disturbing AND if a JURY were to see the video of the incident there is no doubt that the jury will award

PLAINTIFF ALL RELIEF REQUESTED.

IT IS OBVIOUS THIS MATTER IS VERY COMPLEX WHICH IS WHY IF PLAINTIFF RECEIVES REPRESENTATION IT WOULD LEAD TO A QUICKER AND MORE JUST RESULT. THIS MATTER HAS BEEN IN THIS COURT FOR ALMOST 5 YEARS AND IT WOULD BENEFIT THE COURT'S DOCKET TO ASSIST PLAINTIFF WITH HIS REQUESTS.

FOR THE FOREGOING REASONS, THE PLAINTIFF REQUESTS A TELECONFERENCE WITH YOUR HONOR AND THE DEFENDANT AND GRANT PLAINTIFF'S REQUEST FOR THE APPOINTMENT OF COUNSEL. LASTLY PLAINTIFF REQUESTS COURT TO PROVIDE PLAINTIFF WITH A UPDATED DOCKET SHEET AND A UNDERSTANDING ON WHY YOUR HONOR TERMINATED ECF NO. 153 ON NOVEMBER 4, 2024.

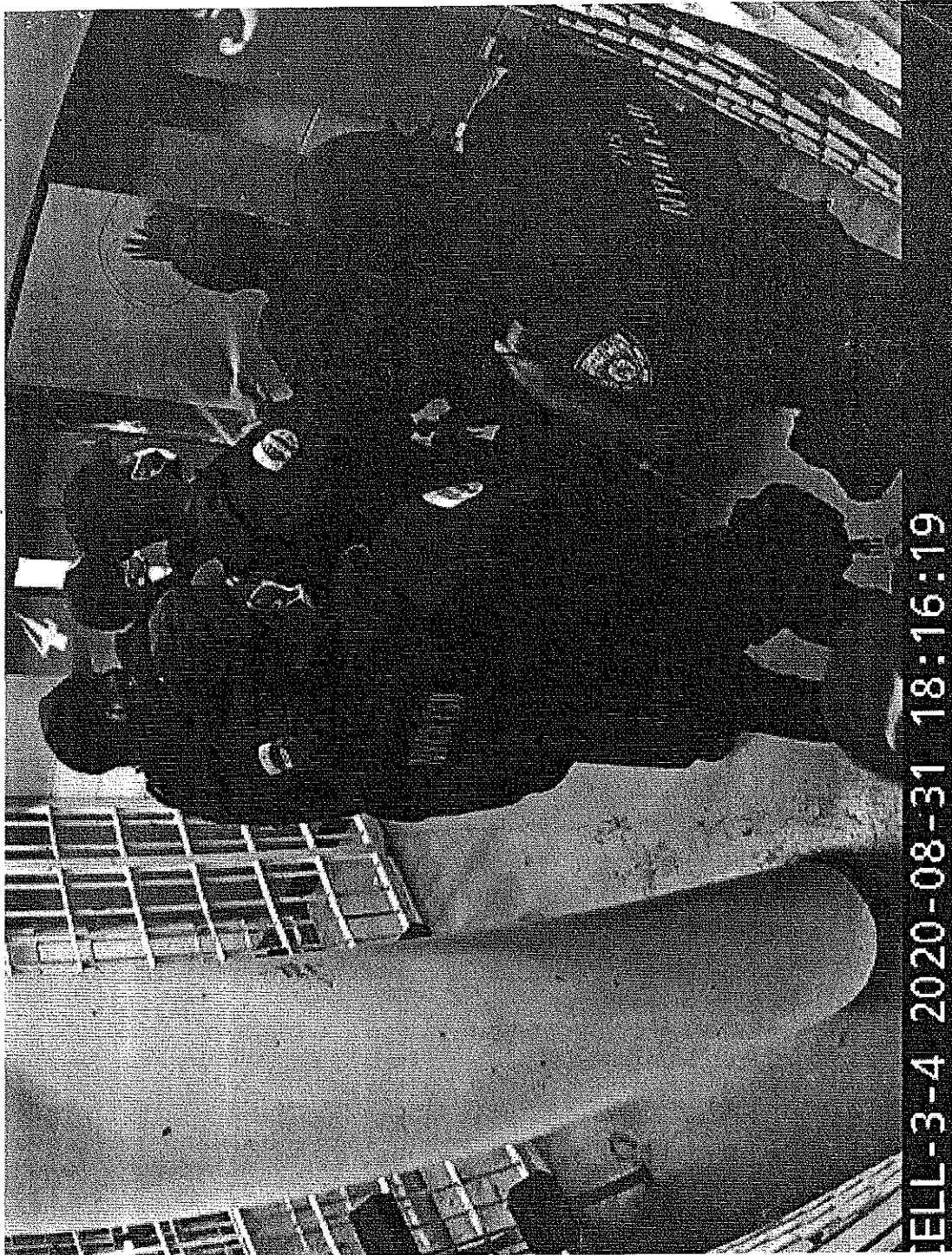
THE PLAINTIFF APPRECIATES THE COURT IN ADVANCE FOR CONSIDERATION IN THIS MATTER.

Respectfully Submitted,

~~P.R.~~ Peter Rodriguez 232287
~~12/29/24~~ PLAINTIFF pro se
WENDE C.F.
WENDE Road
P.O. BOX 1187
ALDEN, NY 14004

I, Peter Rodriguez, D.O.B. 11/06/1990,
swears under oath with the
penalty of perjury that this
letter and everything stated in
it, is fact and truth to the best
of my knowledge.

P.R.
12/29/24



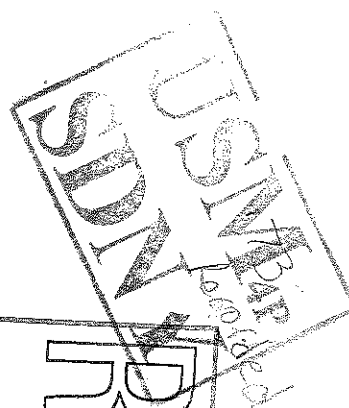
DEF 000440

WENDE CORRECTIONAL FACILITY

Wende Rd., P.O. Box 1187
Alden, New York 14004-1187

NAME: Peter Rodriguez DIN: 22B2287

D-20-18



LEGAL MAIL

1000738833



WENDE

quadrant

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CORRECTIONAL FACILITY



United States District Court
Southern District of New York
US Courthouse - 500 Pearl St
Pro Se Intake RM 200
New York, NY 10007